

**FOOD STAMP NUTRITION
EDUCATION
PLAN GUIDANCE**

Federal Fiscal Year 2004



**United States Department of
Agriculture
Food and Nutrition Service
Food Stamp Nutrition Education**



**United States
Department of
Agriculture**

Food and
Nutrition
Service

3101 Park
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March 31, 2003

Dear State Cooperators:

I am pleased to present to you the State Food Stamp Program Nutrition Education Plan Guidance for Fiscal Year 2004.

As you may know, we have been contemplating repositioning the core element of Systems and Environmental Change in the guidance. Although for many years it has appeared as one of five core elements that form the basis of food stamp nutrition education, this year we are removing it from this listing. We see it as a viable strategy to support the core elements, but not as a stand alone goal of food stamp nutrition education, as are the remaining four core elements.

Other changes that have been made are numerous but minor. In addition to continuing efforts to clarify language throughout the document, here is a listing of some changes of note to planners:

- Formats have been provided to cover all aspects of the plan. Theoretically, a State could use the formats provided electronically to totally construct an approvable State plan. In some cases a form should be completed for each distinct activity or project proposed; in these cases, a cover summary sheet for the State would be very helpful and would expedite approval.

- Interim final reports have been eliminated; States now may simply submit one final report due November 30, or with regional approval, at a later date. Regional offices do retain the right to provide contingency plan approval pending receipt of final reports.


- Although we may continue to refer to this program as the "Food Stamp Nutrition Education Program, (FSNEP) for ease of reference in informal communications, legally it is not a program per se, but a component of the Food Stamp Program. As such, references to FSNEP have been removed from the guidance.

- Greater encouragement to use and seek out new and innovative sources of partnerships is provided. For example, we encourage providers to look to faith-based and community service organizations for local support and assistance. These organizations are proving to be a viable source of assistance in terms of referrals, space donation, and provision of general community support.

- Clarification is provided to assure that nutrition education materials and messages provide no negative written, verbal, or visual expressions of any specific food, beverage or commodity, but rather stress the importance of variety, balance and moderation in the diet.
- The guidance clarifies that medical nutrition therapy is not within the scope of food stamp nutrition education. Although we realize this is not a popular position, we believe it is the proper, reasonable and necessary public policy stance on this issue.
- The guidance clarifies that data needed in the final year report are counts of nutrition education *contacts* with persons or with households, as opposed to counts of people or households. Thus, one person receiving 8 contacts would be counted as 8 contacts to persons. Data may be reported in terms of contacts to people or contacts with households, whichever is the more convenient count.
- The guidance clarifies that both outreach messages and physical activity promotion must be done as a part of nutrition education, as opposed to stand alone activities. This means that a nutrition message must be a prominent part of either of these activities.
- The guidance now specifies the need to review and consider the appropriateness of existing resources available prior to development of new materials. Previous years' guidance only suggested this.
- Tips are provided in the guidance to enhance and expedite clearance and approval.
- Additional clarifications and refinements have been made throughout the guidance.

We wish you the best in your preparation of your Fiscal Year 2004 Food Stamp Nutrition Education State Plan. We hope the changes made in the guidance will facilitate and expedite both the development and approval process. Throughout the year, please feel free to provide comments on the guidance to us through your FNS regional contacts. We are happy to consider your views and welcome suggestions for improvement.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lou Pastura".

Lou Pastura
Director
Program Accountability Division
Food Stamp Program

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Food and Nutrition Service Nutrition Education

The U.S. Department of Agriculture, Food and Nutrition Service (FNS) is committed to improving the nutrition and health of low-income Americans and to assisting in meeting the Healthy People 2010 nutrition and related objectives for the nation (www.healthypeople.gov/). The FNS vision statement emphasizes this commitment: To lead America in ending hunger and improving nutrition and health.

The FNS mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

FNS administers 15 nutrition assistance programs that touch the lives of one in six Americans each year, with the potential to make an important difference in the lives of children and low-income populations by promoting food security, reducing hunger, and improving nutritional status. Please check the FNS web site (www.fns.usda.gov/fns/) for more information on these programs. In conjunction with State and local partnerships, FNS programs also hold great potential to influence food choices and to support healthy eating and related nutrition behaviors.

Effectiveness of nutrition education can be greatly enhanced through collaboration and coordination with all FNS programs and others interested in promoting health and nutrition in low-income populations. Consider capitalizing on the services of community groups, including faith-based organizations, and existing service coalitions at the community level. They can assist in referrals to nutrition education, in providing transportation or in offering facilities for nutrition education sessions to the low income people they reach on a regular basis.

Collaboration and coordination can result in delivery of more uniform messages targeting key community nutrition issues. FNS strongly encourages working together to plan, develop and implement more comprehensive, family-centered nutrition education interventions that reach multiple members of the household through a variety of program channels.

Food Stamp Nutrition Education

Goal

The goal of food stamp nutrition education is to provide educational programs that increase, within a limited budget, the likelihood of food stamp recipients making healthy food choices and choosing active lifestyles consistent with the most recent advice reflected in the Dietary Guidelines for Americans and the Food Guide Pyramid.

Food stamp nutrition education is intended to:

- Assist food stamp households to adopt healthy eating and active lifestyles that are consistent with the Dietary Guidelines for Americans and the Food Guide Pyramid. (Dietary Quality)
- Insure that food stamp households have enough to eat without resorting to emergency food assistance and making sure people eligible for the FSP but not participating are made aware of its benefits and how to apply for them as part of nutrition education activity. (Food Security)
- Improve food stamp households' safe handling, preparation and storage of food. (Food Safety)
- Enhance practices related to thrifty shopping and preparation of nutritious foods by food stamp households. (Shopping Behavior/Food Resource Management)

These four "core elements" form the basic range of educational categories in food stamp nutrition education.

Nutrition Education Plan

Introduction

This document provides guidance for Food Stamp Program State Nutrition Education Plans for FY 2004 to State agency level cooperators. This guidance:

- assists with the preparation of the State nutrition education plan;
- provides sample formats for optional use (appendix A);
- describes reporting requirements for activities covered by the plan (appendix B);
- serves as a reference for policy regarding allowable costs and other policy issues (appendix C);
- provides definitions of key terminology (appendix D);
- encourages use of "Food Stamp Nutrition Connection", a USDA web-based nutrition education resource for educators (appendix E).

Submitting the Nutrition Education Plan

Under current FSP regulations at 7 CFR 272.2(d), State FSP agencies have the option to provide nutrition education. State FSP agencies seeking federal funding to implement or to continue providing food stamp nutrition education must annually submit a plan to FNS for approval.

State Agency Liability

State agencies are responsible for making allowable cost determinations and are fully liable for repayment of Federal funds should those costs later be determined unallowable. FNS regional office financial management and program staff are available to provide technical and other assistance to State agencies in developing nutrition education plans.

Submission Deadlines

As specified under 7 CFR 272.2(e) of the regulations, the food stamp nutrition education plan must be signed by officials of the State agency and must be submitted to the FNS regional office annually no later than August 15 for the following federal fiscal year's operation. The plan may be submitted before August 15. State agencies must submit amendments to their plans to FNS for prior approval whenever there are increases in budget or changes in the scope of activities in an approved plan.

Multi-year Plans

State agencies may submit multi-year plans with the understanding that

- any changes in planned activities and budget must be approved as an amendment to the plan and
- approval of budgets and planned activities is on an annual basis.
(Because the Food Stamp Program is funded on an annual basis, it is not possible for FNS to make approval commitments for either budget or activities into future years).

Expedited Approval

To expedite approval, FNS recommends the following:

- Study the guidance carefully to assure that plans are consistent with policy and allowable costs, carefully constructing waiver requests with appropriate documentation.
- Consider using the formats provided in Appendix A.
- Plan to submit prior to the August 15 due date.
- Consolidate local plans into one state plan with a summary cover document.
- Keep the plan short, but provide clear, concise essential descriptions and justifications for planned activities.
- Make sure the previous year's final report is provided to FNS by the November 30th due date. FNS reserves the right to withhold final approval of the subsequent year's plan pending receipt of this final report.

Nutrition Messages

The Dietary Guidelines for Americans are the foundation for nutrition education in all FNS nutrition assistance programs. Therefore, messages delivered through food stamp nutrition education must be consistent with federal Dietary Guidelines for Americans. Please check the website www.cnpp.usda.gov for complete information on the Dietary Guidelines for Americans.

In summary, these Guidelines are as follows:

- Aim for a healthy weight
- Be physically active each day
- Let the pyramid guide your food choices
- Choose a variety of grains daily, especially whole grains
- Choose a variety of fruits and vegetables daily
- Keep food safe to eat
- Choose a diet low in saturated fat and cholesterol and moderate in total fat
- Choose beverages and foods to moderate your intake of sugars
- Choose and prepare foods with less salt
- If you drink alcoholic beverages, do so in moderation

Nutrition Education Core Elements

States should focus on key core elements when preparing their annual plans for nutrition education. These core elements reflect the primary topical emphasis areas in food stamp nutrition education. Of these core elements, however, dietary quality should be considered among the most important and addressed in a comprehensive manner.

The elements are:

- Dietary Quality
- Food Security
- Food Safety
- Food Resource Management/Shopping Behaviors

The following is a brief explanation of the elements:

Dietary Quality

Applies to the nutritional value of food acquired, and how well overall diets of food stamp participants compare to the Food Guide Pyramid and the Dietary Guidelines for Americans.

Food Security

Applies to the general well being of a household in terms of assured access to an adequate supply of food at all times in order to support a healthy, active life. This includes a readily available supply of nutritious and safe foods and the assured ability to acquire these foods in a socially acceptable manner. Promotion of participation in the Food Stamp Program to eligible nonparticipating persons as part of nutrition education is a critical aspect of this element.

Food Safety

Applies to how food is handled. For example, it deals with issues such as hand-washing, length of time food may be left without refrigeration, the temperature at which food should be stored, and whether food is properly and fully cooked.

Shopping Behavior/Food Resource Management

Applies to the practices related to thrifty shopping for and management of food dollars. These include such skills as making shopping lists, reading labels for nutritional value, menu planning, and basic cooking.

Nutrition Education Interventions

FNS is especially interested in nutrition education interventions in the following major areas which may incorporate one or more of the key core elements.

- Efforts directed at increasing consumption of fruits and vegetables in low-income populations (including those focused on racial/ethnic groups);
- Interventions and activities that promote healthy weight (includes nutrition and physical activity focus)
- Partnerships and collaborations that involve other FNS Programs in planning and delivering nutrition education (includes promoting a healthy school nutrition environment);
- Nutrition education activities conducted in food stamp offices where food stamp eligibility assessment is completed.

State Plan Guidance

The following section will take you through completing your nutrition education plan. Part I asks you to report on Fiscal Year 2003 activities, and Part II asks you to report on Fiscal Year 2004 planned activities. For the convenience of State agencies, formats are provided in Appendix A for reporting information requested in plan guidance. We recommend the use of these formats. Prior to writing your plan, you may want to review all guidance carefully so that your plan meets basic requirements.

Part I. Final Report of Fiscal Year 2003 Nutrition Education Activities (Appendix A, Attachment 1)

Section A. Results

Summarize the nutrition education activities specified in your fiscal year 2003 plan and report your progress in improving nutrition and in increasing physical activity of food stamp nutrition education participants. This final report is due to your FNS regional office by November 30, 2003. By written request to the FNS region, States may ask to extend the deadline. FNS regions reserve the right to withhold final approval of the Fiscal Year 2004 plan pending receipt of the final report for Fiscal Year 2003. Contingent approvals for Fiscal Year 2004 may be made pending receipt of the final report for Fiscal Year 2003.

Please include the following, as appropriate:

1. General observations
2. Geographical areas reached/primary sites.
3. Primary nutrition education methods (one-on-one, media campaign, classes, etc.)
4. Primary nutrition education topics and core elements covered.
5. Outcome evaluation used to assess the impact and effectiveness of your program.
6. Provide data, **if available**, on successful interventions, in terms of number of participants who positively changed behavior or indicated intent to change behavior.
7. Describe your most significant achievement for the year.

Section B. Nutrition Education Interventions (Appendix A, Attachment 2)

Describe one key project or intervention in each of the following major areas of public interest that you undertook, and provide related materials. (Not all states will have an intervention in each of these areas.)

- Efforts directed at increasing consumption of fruits and vegetables in low-income populations (including those focused on racial/ethnic groups);
- Interventions and activities that promote healthy weight (includes a nutrition and physical activity focus);
- Partnerships and collaborations that involve other FNS Programs in planning and delivering nutrition education (includes promoting healthy school nutrition environment).
- Nutrition education activities conducted in food stamp offices where food stamp eligibility assessment is completed.

Use of the form approved by OMB in Appendix A, Attachment 2 is recommended. This form, the Nutrition Education Description Form, may be used to fulfill requirements of this section. Regional offices may ask you to submit this form at various times throughout the year. Provide new submissions, as well as copies of any previous submissions over the past year, as part of your Final Report for fiscal year 2003.

Section C. Data (Appendix A, Attachment 3)

Provide the number of contacts made with Food Stamp Program nutrition education in fiscal year 2003 using all three of the categories below (direct, indirect, and total). You must report for all three categories, but may report your numbers either in terms of contacts with households or with persons. Please specify whether you are reporting contacts with persons or households. Reporting the number of contacts with persons is preferable.

1. The State's total number of direct contacts made through food stamp nutrition education activities. (This figure represents the number of contacts made to people or to households participating in education interventions, such as classes, workshops, or group discussions. Each intervention with an individual is counted as a separate contact. For example, if one person attends 8 classes on nutrition, this is counted as 8 direct contacts.)
2. The State's total number of indirect contacts made through your food stamp nutrition education activities. (The number of people or households indirectly exposed to a range of educational materials, such as public service announcements, billboards, newsletters, materials, computer programs etc.)
3. The State's total number of contacts made to households or to persons. (Sum of numbers one and two above)

**Part II. Fiscal Year 2004 Nutrition Education Plan
(Appendix A, Attachment 4)**

Section A. Needs Assessment of Target Population (for Fiscal Year 2004)

Include the following in your Needs Assessment Summary.

1. Describe your needs assessment procedure and results about the specific needs of your food stamp and other low income populations that will be used in program planning, including by not limited to:
 - a. under- and unserved populations
 - b. under- and unserved areas of State
 - c. higher risk program segments
 - d. key nutrition issues
 - e. language and educational levels
 - f. racial/ethnic makeup
2. Describe the food stamp and other low income populations you plan to target. Specify any new target populations or geographic areas to be served based on needs assessment.
3. As a result of your needs assessment, describe the key nutrition issues you found to be of greatest concern to your food stamp participants and other low income populations and how you intend to address them. Indicate which issues you addressed in fiscal year 2003 and which ones you plan to address in fiscal year 2004.

The Food Stamp Act requires that nutrition education activities be directed exclusively to food stamp program applicants and participants. Waivers may be granted for activities that benefit other low-income persons under certain conditions. See, A.3, for further information about waiver requirements. See Definitions in Appendix D for definition of "project".

Section B. Goals and Objectives (for Fiscal Year 2004)
(Appendix A, Attachment 5)

List your behavioral goals and objectives and the educational strategies and vehicles you will use to achieve them.

1. Describe educational goals and objectives in measurable terms with timeframes: cognitive, affective, and behavioral. Specify your broad goals and related time-specific measurable objectives.
Examples of objectives include:
 - Using the Nutrition Facts Label, participants will identify the fat content of different food items (cognitive).
 - After participating in a session about food safety, learners will demonstrate the intent to learn more about sanitation (affective).
 - As a result of attending a 5-A-Day lesson, participants will consume one additional serving of vegetables per day (behavioral).
2. Describe the methods and strategies, that will be used to achieve your objectives such as:
 - Plans for reaching the target population
 - Social marketing strategies for development and dissemination of educational interventions
3. Identify local level interventions as well as State-based interventions.
4. Identify educational materials and items that are currently being used. Notate if they are in languages other than English.

5. Identify new material to be developed and justify the need for new materials by including results of reviews to identify existing materials. To maximize resources and avoid duplication of effort, State agencies must assess existing materials prior to developing new materials for nutrition education efforts. The following databases may be helpful in this effort.

- Food Stamp Nutrition Connection
www.nal.usda.gov/fnic/foodstamp/index.html
- Eat Smart. Play Hard.™
www.fns.usda.gov/eatsmartplayhard/
- WIC Resource System
www.nal.usda.gov/wicworks/
- Team Nutrition
www.fns.usda.gov/tn

Additional resources may be found at: <http://www.nal.usda.gov/foodstamp>

Appendix E provides detailed information about the Food Stamp Nutrition Connection. We encourage States to submit their materials to the Food Stamp Nutrition Connection web site so that all may benefit.

6. For each objective, provide the performance measures or indicators of expected outcome, for example, change in behavior (ate one extra fruit per day) or improvement in cooking skills (learned how to properly cook dry beans or peas).
7. For each objective, describe how outcome was measured.
8. Describe efforts to coordinate, complement and supplement other programs serving a low-income population, such as WIC, the Child Nutrition Programs, or other programs providing nutrition benefits or other services to low income persons.
9. List project/interventions that will be evaluated in FY 2004. For each project/intervention to be evaluated, provide a brief abstract of what is planned, including methods, target groups, etc.

Important Notes about Materials

- States must ensure that all nutrition messages conveyed as a part of food stamp nutrition education are consistent with the Dietary Guidelines for Americans. Since the Guidelines are the foundation for nutrition education in all nutrition assistance programs, fact-based communications that convey and stress the importance of variety, balance and moderation in the diet, and promote physical activity as keys to promoting health, as well as combating health concerns, and obesity, consistent with the nutrition advice conveyed by the Guidelines, are appropriate and allowable. Food stamp nutrition education funds may not be used to convey negative written, visual, or verbal expressions about any specific foods, beverages, or commodities. This includes messages of belittlement or derogation of such items, as well as any suggestion that such foods, beverages, or commodities should never be consumed. States planning large media campaigns and materials may be asked by FNS Regional Office staff to review media messages and materials prior to release.
- Materials developed with Food Stamp Program funds must include the following non-discrimination statement:

"In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability."

"To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer."

Note: There are no print size requirements when the statement above is used. If the material is too small to permit the full statement to be included, the material must at a minimum include the statement, in print size no smaller than the text, that "This institution is an equal opportunity provider and employer."

- Credit must be provided to the Food Stamp Program as a funding source using language such as "this material was funded by USDA's Food Stamp Program." This credit line must appear on newly developed materials; adding it to reprints is encouraged.
- A brief outreach message about the Food Stamp Program must be provided using language such as, "The Food Stamp Program provides nutrition assistance to people with low income. It can help you buy nutritious foods for a better diet. To find out more, contact (local office or toll-free number, or other useful information to help identify how to get services)." This message need not be included for audiences that are exclusively Food Stamp Program participants.

Section C. Staffing (for Fiscal Year 2004) (Appendix A, Attachment 6)

Provide the following summary by project for all staff in the coming fiscal year's budget that will carry out food stamp nutrition education functions.

Provide the following information by project:

1. Position title
2. Summary of duties associated with food stamp nutrition education by project
3. Percent of time allocated for food stamp nutrition education
4. Salary, broken down by Federal and State/other and total.
(Estimate may be used for budget, but actual time spent must be used for billings)

Section D. Budget Summary

1. Waiver Requests

(Appendix A, Attachment 7)

Provide waiver requests when the target population for a set of activities or interventions goes beyond food stamp recipients and applicants. See Appendix C, section A.3 for information on waivers and documentation needed. Waivers are requested on a "project" basis, meaning that they are requested for a defined geographical area with documented demographics to demonstrate that at least 50 percent of the target population's incomes are at or below 185% of poverty.

2. Contracts, grants or agreements for nutrition education services:

(Appendix A, Attachment 8)

If the State agency intends to contract for food stamp nutrition education with sub-grantees, list each sub-grantee that is a recipient of Federal grants, cooperative agreements or contracts related to food stamp nutrition education. Include the following for each sub-grantee:

- a. Name of sub-grantee or contractor
- b. Federal funding requested
- c. State and other non-federal funding provided and source in terms of cash and in-kind sources.
- d. Description of Services
- e. Cost of Services

3. Budget Information

For each nutrition education sub-grantee:

(Appendix A, Attachment 9)

- a. Attach copy of any interagency agreement(s) that identifies how the federal funds will be shared between the State or county agency and/or other agencies. Submit a list of all sub-grantees and amount of funding for each grant, noting both Federal funding and funding from non-federal sources including cash and value of in-kind services.
- b. Provide the State and Federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at a minimum the information contained in Appendix A, Attachment 9.

Section E. Assessment of Effectiveness of Nutrition Education (Appendix A, Attachment 10)

Describe your evaluation plans.

Evaluation is important for accountability, planning, and learning how to continuously refine and improve nutrition education for low-income families and get behavior change. The following three types of evaluation are appropriate and may be included in your State plan: formative which can involve pretesting of draft nutrition education materials to answer questions about whether materials are understandable, relevant, credible and acceptable to the target audience; process which can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering nutrition education and/or barriers to implementing the intervention; and, outcome or impact to learn how effective the intervention was in changing the target populations' attitudes, awareness or behavior. When describing your evaluation plans, the initial focus should be on projects that involve new or revised materials, new interventions or different target populations.

For information about program evaluation, FNS recommends the following guidance:

- Journal of Nutrition Education: 33, Supplement 1, 2001
- Evaluating Social Marketing in Nutrition: A Resource Manual
<http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF>.
- WIC Evaluation Resource Guide
<http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF>.

Section F. Assurances

(Appendix A, Attachment 11)

To assure compliance with policies described in this guidance, the food stamp nutrition education plan must include the following assurances that:

1. The State food stamp agency is fiscally responsible for nutrition education activities funded with food stamp program funds and is liable for repayment of unallowable costs.
2. Nutrition education activities are conducted exclusively for the benefit of Food Stamp Program participants and applicants.
3. Waivers are approved for each project with nutrition education activities that include non-participants, however, primary beneficiaries must be Food Stamp Program participants, applicants, and other low income people. At least 50 percent of the target population must have gross incomes at or below 185 percent of poverty.
4. Approved food stamp nutrition education activities funded by the State agency through the Expanded Food and Nutrition Education Program (EFNEP) are designed to expand the State's current EFNEP in order to serve additional food stamp recipients or to provide additional educational services to EFNEP clients who are food stamp recipients.
5. Cash or in-kind donations from other non-Federal sources to food stamp nutrition education have not been claimed or used as a match or reimbursement under any other Federal program.
6. Costs incurred by other non-Federal agencies for goods and services for food stamp nutrition education and which are then donated to the Food Stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.
7. Documentation of State costs, payments, and donations for approved food stamp nutrition education activities are maintained by the State and will be available for USDA review and audit.
8. Contracts are procured through competitive bid procedures governed by State procurement regulations.
9. Program activities are conducted in compliance with all applicable Federal laws, rules, regulations including Civil Rights and OMB circulars governing cost issues.

10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.
11. Program activities are reasonable and necessary to accomplish food stamp nutrition education objectives and goals.
12. Materials developed with Food Stamp Program funds include the appropriate non-discrimination statement, credit provided to the Food Stamp Program as a funding source, and a brief message about how the Food Stamp Program can help provide a healthy diet and how to apply for benefits.
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage, or commodity.

Section G. Signatures
(Appendix A, Attachment 12)

The document must be signed by both the State agency Nutrition Coordinator (or alternatively, the State Food Stamp Program Director) and a State agency Fiscal Reviewer prior to submission.

APPENDIX A

SUGGESTED FORMATS FOR PLAN SUBMISSION

Appendix A
Attachment 1

Part I. Final Report of Fiscal Year 2003 Nutrition Education Activities

Section A. Results

Summarize activities specified in your Fiscal Year 2003 Plan and report progress in improving nutrition and in increasing physical activity in a final report due to FNS regional offices by November 30, 2003.

1. General observations
2. Geographical areas reached/primary sites
3. Primary nutrition education methods (one on one, media, social marketing)
4. Primary nutrition education topics and core elements covered
5. Outcome evaluation used to assess the impact and effectiveness of your program. Describe projects/activities that were evaluated. If any, attach copy of completed evaluation reports.
6. Provide data, **if available**, on successful interventions such as the following:
Dietary Quality
Number of participants who...
_____ moved closer to Food Guide Pyramid serving recommendations
_____ moved closer to Dietary Guidelines recommendations
_____ increased their fruit and vegetable consumption
_____ increased their level of physical activity
_____ other (Specify:_____)

Food Resource Management and Shopping Behavior

Number of participants who...

- _____ use a spending plan more often
- _____ utilize a menu plan more often
- _____ shop from a list more often
- _____ comparison shop more often
- _____ other (Specify:_____)

Food Safety

Number of participants who...

- _____ more often wash hands before meal preparation/eating
- _____ less often let food sit out more than 2 hours
- _____ more often keep raw meat separate from other foods
- _____ more often cook meat and eggs thoroughly
- _____ other (Specify:_____)

Food Security

Number of participants who...

- _____ decreased use of emergency food assistance (e.g. food pantry, soup kitchen)
- _____ increased use of non-emergency food assistance programs (e.g. Food Stamp Program, WIC, Child Nutrition Programs)
- _____ applied for the Food Stamp Program specifically
- _____ other (Specify:_____)

Number of participants who (after education) reported having enough to eat:

- _____ always _____ most of the time _____ sometimes
- _____ never

Appendix A
Attachment 1

Partnerships

_____ number of new collaborating partnerships

_____ number of collaborations with existing partners

_____ other (Specify: _____)

7. Describe your most significant achievement for the year.

Part I. Final Results of Fiscal Year 2003 Nutrition Education Activities
Section B. Nutrition Education Interventions

Directions for Completing Nutrition Intervention Description Form

TOPIC: What broad objective or nutrition subject area does this project address? (i.e., diet quality, physical activity, food security, lowering fat, increasing fruit and vegetable consumption.)

PROJECT TITLE: Provide the title of the project and the type of initiative/initiative (e.g., nutrition education curricula, training programs, community interventions, modules, research projects, etc.)

DEPARTMENT/AGENCY/PROGRAM: Provide the name of the department, agency, or program that is responsible for the project (e.g., VA Dept. of Health, NJ Food Stamp Program, CA WIC, Denver Food Bank, MD Dept. of Education, etc.)

NAME AND TITLE OF CONTACT PERSON: Person who will receive and answer future inquiries about the project. The contact person should be involved with the project or program activities.

ADDRESS: Provide the complete address of the contact person, including telephone number, fax number, and E-mail address.

GOAL AND OBJECTIVES: Provide the specific program or project goal and related objectives, or project purpose.

PROJECT DESCRIPTION: Include information about the different components of the project, such as number of educational contacts planned per participant, type of contacts, educational theory, or approaches used such as social marketing. Discuss steps used in the implementation of the project. If the project is a research project, include the design, methodology and attach an abstract.

TARGET AUDIENCE DESCRIPTION: Include information about the characteristics of the project's target audience: age range(s), gender, racial/ethnic background, and nutrition or health risk (such as rate of obesity, overweight and food insecurity).

PROJECT TIMELINE: State the project start and end dates. Indicate if the project is ongoing.

REACH: Report the number of people reached, geographic areas served, the number and/or type of entities, agencies, or organizations that implemented the project; describe the project sites where the intervention was conducted (i.e. number of schools, churches, community centers, etc.) and other information to indicate the reach of the project.

MATERIALS: List all educational materials and activities that were developed or modified for the project along with a brief description of the content and purpose of each material. Be sure to list both those materials that have been developed by your program or agency, and those adapted from other programs or agencies - e.g., State WIC, Food Stamp Program, or Food and Nutrition Service). In addition, include a copy of all **print** educational materials that were developed or modified with your completed Nutrition Education Intervention Form. Include a list of any FNS resources used in the interventions such **Eat Smart. Play Hard.**™ or **Team Nutrition** materials.

RESULTS/EVALUATION: Describe any current or planned evaluation activities for the project. Include results of formative, process or outcome evaluations such as focus group reports. In addition, you may include information about barriers to conducting the project, changes planned to overcome these barriers, and lessons learned in the process. If the evaluation has not been conducted but is planned for the future, please indicate

SYSTEMS and ENVIRONMENTAL CHANGE: Describe any systems or environmental changes promoted to support the objectives of the intervention and progress in achieving the change.

PARTNERSHIPS: Describe collaborative activities and partnerships related to this effort. Indicate any involvement by other FNS Programs such as WIC, FDPIR, School Meal Programs, and identify any intra- or inter-State agency memorandums of understanding related to the intervention.

FUNDING SOURCES: List all previous and current funding sources for the project.

Part I. Final Report of Fiscal Year 2003 Nutrition Education Activities
Section B. Key Nutrition Education Interventions

Nutrition Education Intervention
Description Form

Directions: Use the following to share information about your state and local nutrition intervention targeting FNS Program recipients. FNS will compile and disseminate this information to other FNS cooperators so that they can learn from and build upon your efforts and decrease duplication. Please see the attached directions for a complete explanation of each heading below.

Topic:

Project Title:

Department/Agency/Program:

Name and Title of Contact Person:

Address, Telephone, Fax and Email for Contact Person:

Goal and Objectives:

Project Description:

Target Audience:

Nutrition Education Intervention Description Form

Reach:

Materials:

Results/Evaluation:

Systems and Environmental Change:

Partnerships:

Funding Sources:

Project Timeline (Include start date and end date):

Appendix A
Attachment 3

Part I. Final Results of Fiscal Year 2003 Nutrition Education Activities

Section C. Data

Provide counts of the number of contacts made with food stamp nutrition education in Fiscal Year 2003 through direct contacts, through indirect contacts, and total. You may report this data using either counts of contacts to households or of persons. Counts of persons are preferable.

1. Direct Contacts	2. Indirect Contacts	3. Total (1+2)
_____ Persons or _____ Households	_____ Persons or _____ Households	_____ Persons or _____ Households

Part II. Fiscal Year 2004 Nutrition Education Plan

Section A. Needs Assessment of Target Population (2004)

1. Describe your needs assessment procedure and results to learn about the specific needs of your food stamp and other low income target populations including but not limited to:
 - a. under-or unserved populations
 - b. under-or unserved areas of state
 - c. higher risk population segments
 - d. key nutrition issues
 - e. language and educational levels
 - f. racial/ethnic makeup
2. Describe the food stamp and other low income populations you plan to target. Specify any new target populations or geographic areas to be served based on needs assessment.
3. As a result of your needs assessment, describe the key nutrition issues of concern to your food stamp participants. Indicate which issues you addressed in 2003 and which ones you plan to address in 2004.

Appendix A
Attachment 5

Part II. Fiscal Year 2004 Nutrition Education Plan

Section B Goals and Objectives (2004)

1. Describe nutrition education goals and objectives in measurable terms with time frames. Specify your broad goals and related time-specific measurable objectives.

2. Describe methods and strategies that will be used to achieve your objectives.

3. Identify local level interventions as well as State-based interventions.

4. Identify educational resources that currently are being used. Identify languages other than English.

5. Identify new materials to be developed and justify the need for new materials, including results of reviews to identify existing materials for this purpose.

Appendix A

Attachment 5

6. For each objective, provide performance measures or indicators of expected outcome.
7. For each objective, how outcome will be measured.
8. Describe coordination efforts with other programs serving low income populations.
9. List projects/interventions that will be evaluated in FY 2004. For each project/intervention to be evaluated, provide a brief abstract of what is planned, including methods, target group, etc.

Appendix A
Attachment 6

Part II Fiscal Year 2004 Nutrition Education Plan

Section C. Staffing

[illegible]

Appendix A
Attachment 7

Part II. Fiscal Year 2004 Nutrition Education Plan

Section D. Budget Summary

1. Waiver Request

a) Project name:

b) Project goals:

c) Narrative justification for need for waiver:

d) Description of low income population intended to be reached that are not the program's target population. (Food Stamp Program applicants and recipients)

1. Location of project: (low income housing project, school, WIC clinic, homeless shelter, etc.)

2. Demographic and census data documentation that demonstrates that at least half of this target population is at or below 185 percent of poverty:

a. Data source (census, free and reduced price meal applications in schools, etc.)

b. Data

Appendix A
Attachment 8

Part II Fiscal Year 2004 Nutrition Education Plan

Section D. Budget Summary

2. Contract/Grants/Agreements for nutrition education services

Fill this information in for each contract, grant, or agreement

a. Name of subgrantee or contractor

b. Federal funding requested

c. State and other non-Federal funding amount and source (allowable non-federal share). Include case and in-kind sources.

d. Description of services

e. Cost of Services

Note: Total amount for all contract/grants to be entered as line 2 of budget summary. (Attachment 9)

Appendix A
Attachment 9
Part II. Fiscal Year 2004 Nutrition Education Plan

Section D. Budget Summary

3. Budget Information Project Name:						
Expenses	(a) State/Local Funds		(b) Other Non-Fed. Funds		(c) Total Non Federal Funds (a+b)	(d) Federal Funds
	Cash	In-kind	Cash	In-kind		
1. Salary/Benefits						
2. Contracts/Grants/Agreements						
3. Non-Capital Equipment/Supplies						
4. Materials						
5. Travel						
6. Administrative						
7. Building/Space						
8. Maintenance						
9. Equipment & other Capital Expenditures						
10. Indirect Cost						
11. Totals						

12. Total estimated outlays/costs (state, local, nonfederal, federal)	
--	--

Attach: Copies of interagency agreements to support line 2

Appendix A
Attachment 10

Part II Fiscal Year 2004 Nutrition Education Plan

Section E. Assessment of Effectiveness of Nutrition Education

Describe your evaluation plans:

Part II. Fiscal Year Nutrition Education Plan

Section F. Assurances

To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education Program Plan must include the following check list of assurances that:

1. The State Food Stamp Agency is fiscally responsible for nutrition education activities funded with food stamp program funds and is liable for repayment of unallowable costs. ☐ YES ☐ NO
2. Nutrition education activities are conducted exclusively for the benefit of Food Stamp Program participants and applicants. ☐ YES ☐ NO
3. Waivers are approved for each project with nutrition education activities that include non-participants, however, primary beneficiaries must be Food Stamp Program participants, applicants, and other low income people. At least 50 percent of the target population must have gross incomes at below 185 percent of poverty. ☐ YES ☐ NO
4. Approved food stamp nutrition education activities funded by the State agency through the Expanded food and nutrition education (EFNEP) are designed to expand the State's current EFNEP in order to serve additional food stamp recipients or to provide additional educational services to EFNEP clients who are food stamp recipients. ☐ YES ☐ NO
5. Cash or in-kind donations from other non-Federal sources to Food Stamp Nutrition Education have not been claimed or used as a match or reimbursement under any other Federal program. ☐ YES ☐ NO
6. Costs incurred by other non-Federal agencies for goods and services for food stamp nutrition education and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project. ☐ YES ☐ NO

Appendix A
Attachment 11

7. Documentation of State costs, payments, and donations for approved food stamp nutrition education activities are maintained by the State and will be available for USDA review and audit. ☐ YES ☐ NO
8. Contacts are procured through competitive bid procedures governed by state procurement regulations. ☐ YES ☐ NO
9. Program activities are conducted in compliance with all applicable Federal laws, rules, regulations including Civil Rights and OMB circulars governing cost issues. ☐ YES ☐ NO
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them. ☐ YES ☐ NO
11. Program activities are reasonable and necessary to accomplish food stamp nutrition education objectives and goals. ☐ YES ☐ NO
12. Materials developed with Food Stamp Program funds include the appropriate non-discrimination statement, credit provided to the Food Stamp Program as a funding source, and a brief message about how the Food Stamp Program can help provide a healthy diet and how to apply for benefits. ☐ YES ☐ NO
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage or commodity. ☐ YES ☐ NO

Part II Fiscal Year 2004 Food Stamp Program Nutrition Education Plan

Section G Signatures

FOOD STAMP PROGRAM

Fiscal Year 2004

ANNUAL PLAN FOR NUTRITION EDUCATION

FOR

STATE AGENCY _____

FISCAL YEAR _____

DATE ____/____/____

Certified By:

STATE AGENCY NUTRITION COORDINATOR
OR
STATE FOOD STAMP DIRECTOR

DATE

Certified By:

STATE AGENCY FISCAL REVIEWER DATE

APPENDIX B

REPORTING AND RECORD RETENTION REQUIREMENTS

Form 366A

In addition to submitting the nutrition education plan, State agencies must submit FNS-366A, Budget Projection Statement, for FNS approval. State agencies must report their projected requested Federal funding for nutrition education on FNS Form FNS 366A, line 17, Nutrition Education. This report is due August 15th in the FNS Regional office for the upcoming Federal fiscal year.

Form SF-269

The State agency must report nutrition education expenditures, in Column 17- Nutrition Education- on FNS Form SF-269. This report is to be submitted quarterly, 30 days after the end of each quarter. A final report is due 90 days following the end of the Federal fiscal year.

Record Retention and Management

Food Stamp Program regulations require that all records be retained for three years from fiscal closure. This requirement applies to fiscal records, reports and client information.

APPENDIX C

COST POLICY

The following discusses the costs that can be approved for Federal reimbursement under an approved Food Stamp Nutrition Education Plan.

Food Stamp Program Reimbursement Structure

Under Section 16 of the Food Stamp Act of 1977, as amended, a State food stamp agency is reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved nutrition education activities. Because State costs, by law, are reimbursed, food stamp nutrition education is not a "grant" program, which provides a set level of funding for specific activities for a specific period of time, nor is it technically a match program. It reimburses 50 percent of States' allowable expenditures. Nevertheless, the term "grantee" is used in this guidance to denote the State agency, and the term "subgrantee" is used to denote those entities that are under agreement with the State agency to provide services. Despite the use of this nomenclature, it is important to understand that the food stamp program operates as a reimbursable agreement. Federal funds reimburse States for only half of all allowable costs.

While plan activities are approved on an annual basis, allowable costs may be reimbursed in the subsequent year if the activity overlaps fiscal years or if payment for services delivered during the fiscal year was delayed. Nutrition education project obligations must be established in the fiscal year the funds are appropriated but disbursements against these obligations may occur after the fiscal year closes. Federal reimbursement is subject to the availability of Federal funds. States agencies have a 2-year deadline to claim prior year costs. Expenditures must be submitted within 2 years after the calendar quarter in which the State (or local) agency incurred the cost.

Allowable Costs

Allowable costs are specified under OMB Circulars A-87, A-21, and A-122, Departmental rules at 7 CFR 3016 and Food Stamp Program rules at 7 CFR Part 277. To be allowable, all costs charged to FNS must be valid obligations of the State, local government or sub-grantee.

State Plan Amendments

If State agencies determine that actual expenditures will exceed planned expenditures, a State must submit a plan amendment prior to incurring the expenses for Federal approval to ensure that costs are allowable, reasonable and necessary. Further, if the scope of the activities in a plan change, regardless of the impact on the planned expenditures, a State must submit a plan amendment for FNS approval.

A. Allowable and Unallowable Administrative Expenses

Allowable administrative costs are costs for operating the Food Stamp Nutrition Education Program which include all administrative expenses that are reasonable and necessary to operate approved nutrition education activities. Allowable administrative expenses include:

- salaries and benefits of personnel involved in food stamp nutrition education and administrative support;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of food stamp educational materials;
- lease or rental costs;
- maintenance expenses;
- other indirect costs;
- charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

Unallowable administrative expenses- Listed below are unallowable costs per A-87 and A-21 for State and local governments: (Similar lists are found in A-122, the Circular applicable for non-profit organizations).

- Bad Debts- Uncollected accounts or claims, and related costs.
- Contingencies- Contributions to an emergency reserve or similar provision for unforeseen events. (These are not insurance payments which are allowable).
- Contributions and Donations- (Usually these are political in nature.)
- Entertainment-Costs which are primarily for amusement or social activities. (This is actually one with a lot of exceptions. Meals for example are cited in the Circular, but within the context of training, meals might be allowable. There are a number of costs here which require a reasonable judgment based on why or when the activity takes place).

- Fines and Penalties- Violations or penalties for failure to comply with Federal, State, or Local laws.
- Governor's Office- Specifically costs of general government. Costs which may be directly charged to a Federal grant may be allowable. (For example if a person assigned to the governor's office devotes 100 percent of his/her time to the Food Stamp Program, the cost may be allowable. Each situation, however, must be judged on its own merit).
- Indemnification- Payments to third parties and other losses not covered by insurance.
- Legislative expenses.
- Losses Not Covered by Insurance (see Indemnification above. These costs are similar, but not the same).
- Under Recovery of Costs under Federal Funding Agreements- Shortfalls in one grant cannot be charged to another Federal grant. (This is not the same as charging two Federal grants for a share of the costs of the activity if both agencies benefit from the activity funded. However, an allocations basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic Beverages.

For *A-21* there are some *unallowable cost* categories in addition to those listed above:

- Advertising and Public Relations- Unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant.
- Alumni Activities.
- Commencement and Convocations.
- Legal Fees Which Result From a Failure to Follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive Lobbying.
- Goods and Services for Private Use.
- Housing and Personal Living Expenses.
- Interest, Fund Raising, and Investment Management- (For interest, there are exceptions. But if the cost is shown it needs to be examined in light of the exceptions.)
- Any and All Political Party Expenses.
- Preagreement Costs- All costs incurred prior to the grant award.
- Scholarships and Student Aid- (There are exceptions which should be reviewed if these costs appear in budget.)
- Student Activity Costs.

- Travel- Allowable but with restrictions as to amounts involved, level of transportation costs (i.e. no first class tickets).

Reasonable and necessary costs

While the OMB circulars spell out what is allowable, costs that may be covered by the Food Stamp Program for nutrition education must also meet a "reasonable and necessary" test.

Reasonable Costs

- Provide a program benefit generally commensurate with the costs incurred,
- Are in proportion to other program costs for the function that the costs serve,
- Are a priority expenditure relative to other demands on availability of administrative resources, and
- Carry constructive nutrition education messages consistent with dietary guidelines

Necessary Costs

- Are incurred to carry out essential functions
- Cannot be avoided without adversely affecting program operations
- Do not duplicate existing efforts

Note: Remarks in parentheses represent clarification by the Food and Nutrition Service and are not Circular language.

A.1 Property Procurement and Management

The State agency and all sub-grantees must follow procurement requirements found in 7 CFR 3016.

The State agency must receive prior Federal approval before procuring or requesting reimbursement for equipment valued at more than \$5,000 per item. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project. Inventory records must be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

A.2 Indirect Cost Rate

Indirect cost computation is based on policy prescribed by the Office of Management and Budget (OMB). The intent of the OMB policy is to ensure that the Federal Government bears its fair share of costs in accordance with generally accepted accounting principles.

Indirect costs are defined as those that benefit more than one program but are not easily identified to a specific program. The general rule is that if a cost can be readily attributed to a specific program it should be classified as a direct cost rather than be included in the indirect cost pool.

One basic computation method is to 1) identify all the costs that are considered indirect costs because they serve several programs (e.g., payroll, computer center, personnel), 2) total indirect costs, 3) identify all the programs that are served by indirect costs 4), total the direct costs of all the programs served. Divide total indirect costs by total direct costs, which results in an "Indirect Cost Rate." This rate is then applied to the direct costs of each program (in this case nutrition education) and the result is charged to the program as its "indirect cost."

Indirect Cost Plans and Applicable Rates- The use of indirect cost plans by colleges and universities is allowable. However, unless justification is provided, only the off-campus rates may be used. In addition, if additional categories, such as "other sponsored activities", are covered, the instructional rates can not be used without justification. In most plans only one rate may be used for each program charged. As a result, any justification for using either the on-campus or off-campus rate must be based on where the majority of the allowable activities take place. In this case the allowable activities are defined as those activities that provide nutrition education to the recipient population. Other activities, such as research and data analysis, while allowable, are not understood to be the primary purpose of food stamp nutrition education, and therefore are not to be used in determining where the majority of the activities take place.

Small local agencies may not have staff with the expertise to develop indirect cost rates. They should, however, be able to go to their State agency for assistance or obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs that are included as either direct or indirect costs.

- If the State agency does not accept the responsibility for approving the indirect cost rate, or disapproves the rate, the FNS Regional Office will not accept the rate.
- The State agency must document its plan to indicate acceptance of the indirect cost rate.

State agencies are responsible for ensuring that indirect costs included as part of the State Food Stamp Nutrition Education Plans are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement. FNS may request documentation in support of an indirect cost rate. See definitions in Appendix D for more information on "cognizant agency". Local agencies which do not have a cognizant agency to review and approve their rates may apply, through the State agency, for approval to use a rate developed either by or for the local agency. The FNS Regional office may accept or reject use of the rate based on the rate computation documents.

A.3 Waiver

Exclusivity Clause Waivers. Food stamp regulations require State agencies to provide "assurance" that nutrition education programs "are conducted exclusively for the benefit of Food Stamp Program applicants and participants" [7CFR 272.2(d)(2)(iii)]. These regulations are consistent with language in the Food Stamp Act. However, State agencies may pursue an "exclusivity waiver" on a project basis to allow each project to conduct activities that inadvertently reach other low income individuals that are not currently participating. The waiver request must document on a project basis that such activities will generally be targeted to Food Stamp Program participants, applicants, and other low-income households. Project is defined in Appendix D as "a discrete unit of nutrition education intervention at the local level with a specifically identified low income target population".

To be approvable, each waiver request for each project must demonstrate that it is targeted generally to Food Stamp Program participants and applicants and that at least 50 percent of the population targeted has gross household incomes that are at or below 185 percent of poverty. Projects with waivers should continue to target their programs to the most indigent of populations.

In developing data for waiver requests, general census, demographic data, school lunch free and reduced price data, and WIC participation data may be used to calculate the extent to which the population targeted meets the income criteria. Asking individuals for personal income data is not an appropriate means to determine whether the target audience is low income, and goes beyond the scope of data needed for waiver purposes. The Census data website is a good source of state county level statistics. See www.census.gov or www.fns.usda.gov/pd/fspmain.htm

Documentation to show that each project meets these criteria must be submitted in one or more waiver requests. States may submit a separate waiver request for each project or they may submit a listing of local projects for which they are seeking waivers. Regardless of format, the waiver request must contain project-specific information and supporting documentation in sufficient detail to ascertain that each project is targeted to Food Stamp Program applicants and participants, and other low income groups. At least 50 percent of the target audience must have gross incomes at or below 185 percent of poverty. Each waiver request will be approved or denied separately, regardless of format, on the basis of supporting documentation. Statewide waivers are not permissible.

To be approvable, such waiver requests also must provide for the project to offer an educational message about the Food Stamp Program, its benefits, and how to apply as a part of the nutrition education provided.

Exceptions to Requirement for Exclusivity Clause Waivers

1. Food Distribution Program on Indian Reservations (FDPIR). Because persons eligible for the Food Stamp Program may participate in FDPIR in lieu of the Food Stamp Program, FDPIR participants may be targeted for food stamp nutrition education without waiver, and will be considered as if participating in the Food Stamp Program.
2. Categorically Eligible Persons. Persons eligible for the Food Stamp Program by virtue of their allowable categorical eligibility consistent with Food Stamp Program regulations at 273.2(j) may be targeted for food stamp nutrition education without waiver.

Use of Private Cash Donation Waivers. Federal regulations prohibit the consideration of private cash donations as part of a State's expenditures for which FNS will reimburse 50 percent. [7CFR277.4 (c) &(d)]. However, a waiver is permissible with the following assurances:

1. no endorsements of donors or products will be given in connection with the nutrition education activities.
2. no funds will revert back to donor or benefit the donor.

3. Funds are donated without restriction on use for a specific person, institution, or facility.
4. Funds are to be under the State's administrative control.

Assurances that these conditions are met must be included in the State agency's waiver request and noted in the nutrition education plan. As State agencies seek private cash donations, they need to understand these constraints. State agencies may also accept private in-kind donations, but they may not claim their value for Food Stamp Program reimbursement. No waivers are available to permit private in-kind donations to be considered as part of the State's expenditures for which FNS will reimburse 50 percent.

A.4 Donations from Non-Federal Public Agencies

As specified under 7 CFR 277.4(c)(d)(e), Federal reimbursement for the costs of services or property donated by other non-federal public (i.e., government) agencies is allowable provided that the donated costs are not billed or claimed to another Federal program or used to match another federal program. The State agency must maintain records or an audit trail to support costs directly claimed or used as a match. The match must be for food stamp nutrition education allowable activities.

A.5 Non-Federal Public Agencies

A non-federal public agency is an organization of State or local government that is supported by funds derived from general tax revenues (receipts) of a State or locality specifically allocated from appropriate budgetary authority such as a State legislature, county or local government. This would include, for example, State or local government financed educational institutions and State funded hospitals. Funding from non-federal public agencies serves as the foundation for calculating a State's total costs of food stamp nutrition education, of which 50 percent is reimbursed with Federal funds.

The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in 7 CFR 277.4(c), can be interpreted to include "marketing orders, councils and commissions". OGC concluded that marketing orders, councils, and commissions may be included within the term, "non-federal public agency" for the purposes of using the donation as part of State cost for federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they are engaged. To be included as State cost, the budgetary

authority must be delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage must be governmental in nature. The activities must affect the right of private parties through adjudication, rule making, investigating, prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

The State agency must describe in the plan the source of the entity's regulatory authority and the nature of the activities in which the entity is engaged. The State agency must also describe the relationship of the entity to the objectives of the proposed nutrition education activity. Funding provided by the marketing order should be used to support objectives of the nutrition education activity benefiting the food stamp households. Marketing orders funding for food stamp nutrition education should not be used to promote single-commodity nutrition education messages to the exclusion of the overall nutrition education objectives.

A.6 Medical Equipment

FNS has determined, based on OMB Circular A-87, that medical equipment or health services related to health assessments of recipients, obtaining clinical data on nutritional status, chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. For example, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to administer dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.7 Gardening

Gardening is a beneficial project that leads to the economical production and consumption of healthy and fresh food. The provisions of OMB Circular A-87 allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies are not allowable food stamp nutrition education costs. Only educational supplies, curricula and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. (Note that participants may use program benefits (coupons/EBT) to purchase seeds and plants for gardening purposes).

A.8 Valuation of Publicly Owned Space

Charges For Publicly Owned Space-Space owned by public entity cannot be charged to a Federal grant based on private market rental rates. The entity can only recover the costs of space through a depreciation schedule or use allowance, applicable charges for utilities, maintenance, and general upkeep.

Federal requirements regarding the valuation of publicly owned space is contained in Office of Management and Budget (OMB) Circulars A-87, 21, and A-110 and Departmental regulations at 7 CFR 3016 and indicate that in no case may publicly owned space be "donated" or billed at fair market rental rates. The only method allowable for calculating reimbursement of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space regardless of whether they are direct billed or donated. The cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and utilities. (FNS Policy Memorandum-March 9, 1998)

Example of Calculating Valuation of Publicly Owned Space-Only the depreciation or use allowance method may be used to charge FNS for use of publicly owned space. Depreciation is dividing the cost of the building over its useful life. For example, if a building cost \$50,000 to build and it had a useful life of 20 years, the yearly depreciation would be \$2500. This cost is spread over the square footage of the building, resulting in an annual rate per square foot. Food Stamp Program share would be the amount of space that is used for the FSP. A use allowance is used when the building is fully depreciated. You are allowed to charge no more than 2 percent of the cost of the building per year. In the example above, States could only charge \$1000 per year.

A.9 Time Records

Time records are required for all nutrition education staff devoting less than 100 percent of their time to food stamp nutrition education unless a federally approved Random Moments Time Study is used to allocate the time spent on allowable activities. A semi-annual certification for staff which spend 100 percent of their time on food stamp nutrition education is required.

States preparing food stamp nutrition education plans should review staff allocation time records for activities eligible for reimbursement. Budget sections of State plans should confirm that time records are documented

weekly for nutrition education staff devoting less than 100 percent of their time to the project. OMB Circular A-21 allows for time reporting less frequently than weekly; however, FNS policy requires weekly time reporting. Grantees who have federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities. State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS regional office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy of the time estimate. Time records need not be submitted with the plan but should be maintained by the project for audit. (FNS Policy Memorandum-April 1998)

Alternatives To Time Records- For staff employed by universities and colleges, an alternative to time records or time studies is allowed under OMB Circular A-21. This alternative is called Plan Confirmation. Plan Confirmation is a process whereby staffing estimates are used to claim costs during an academic period, usually a semester. At the end of the period, the grantee confirms that the estimate was either correct or incorrect. FNS will accept the use of Plan Confirmation for charges to the Food Stamp Program providing appropriate approval has been received from the DHHS Division of Cost Allocation (DCA). Approval is on an exception basis from DCA. If a University has requested the use of Plan Confirmation, and the most recent audit does not disclose any issues with its use, approval is granted. For any university or college that has requested Plan Confirmation, and has had an audit that supported its use, FNS will allow the university or college to use Plan Confirmation for charges to FNS.

A.10 Membership, Subscription, and Professional Activity Cost

Cost of institution memberships in business, technical, and professional organizations are allowable. These memberships, subscriptions, and professional activity costs must be consistent with the effort to promote the provision of quality nutrition services to Food Stamp participants. Costs of institutional memberships for nutrition personnel that work directly with the Food Stamp nutrition education project are reimbursable. The cost to the institution must be prorated according to the percentage of time actually spent by the employee in performing nutrition education activities for the food stamp project. Professional registration or license fees paid by individuals would not be allowable costs since the fees would be considered personal expenses, not institutional expenses.

A.11 Nutrition Education Reinforcement Materials

Nutrition education reinforcement materials refers to a class of goods that are given to applicants, participants, potential participants, or persons closely associated with the Food Stamp Program (such as staff) containing or conveying good nutrition messages for the purpose of reinforcing nutrition messages and promoting good nutrition practices and increased physical activity. Such items must have a direct relationship to program objectives and the expected behavior change. Other terms that are used to describe these items include memorabilia, souvenirs, promotional items, incentives, and educational extenders. Such items are allowable costs only if they are deemed reasonable and necessary, contain or reinforce good nutrition messages, and are of nominal value (\$3 or less per item).

FNS could not relate program reinforcement materials to any of the cost items specifically mentioned in the OMB Circular A-87 and A-122. FNS/USDA must, therefore, apply the circulars' general rule for determining the allowability of costs, paramount among which are the reasonable and necessary cost tests.

Program reinforcement materials for nutrition education also must:

- be targeted to Food Stamp Program participants,
- have a clear relevance and useful connection to particular FNS/Food Stamp Program nutrition education messages,
- either contain an educational message or have a use that is directly relevant to reinforce nutrition education messages, (example, disposable thermometer to reinforce food safety)
- have value as nutrition education aids,
- be reasonable and necessary in terms of cost and relevance,
- be offered only after weighing and assessing other relative needs and cost effectiveness,
- be of nominal value of \$3 or less per item,
- not be used solely for staff morale boosters.
- if for physical activity promotion, must be provided in conjunction with relevant nutrition and physical activity message

Examples of Allowable and Unallowable Program Reinforcement Materials

FNS/USDA is not able to provide exhaustive lists of specific allowable and unallowable items. However, using the criteria listed in the preceding paragraph, some illustrative examples of allowable and unallowable program reinforcement materials are provided below:

Examples of Allowable Nutrition Education Reinforcement Items:

Calendars that contain important nutrition education messages, refrigerator magnets picturing the Food Guide Pyramid, measuring cups, measuring spoons or other items of nominal value which reinforce an important nutrition message. Examples of available messages include, Thermy™ the food thermometers' safety message ("It's safe to bite when the temperature is right"), the 5 A Day Campaign, or USDA's **EAT SMART. PLAY HARD.™** Campaign.

Examples of Unallowable Nutrition Education Reinforcement Items:

Celebratory items, and items designed primarily as staff morale boosters; items (even of nominal value) that are not reasonable or necessary and/or have no nutrition education message; any program incentive item intended for persons who are not Food Stamp Program participants or applicants, or with a waiver, low-income non-participants; any item costing more than 3 dollars.

A.12 Physical Activity

The *Dietary Guidelines for Americans (DGAs)* (<http://www.usda.gov/cnpp>) provide the framework for nutrition policy in FNS nutrition assistance programs. The 2000 DGA embrace maintenance of a healthy weight and improved fitness level. As such, FNS supports the 2000 DGAs concept on physical activity. The provisions of OMB Circular A-87 allow USDA/FNS to make reasonable judgments as to what is necessary and reasonable to deliver nutrition education. Given the DGA, the inclusion of physical activity promotion as a part of the food stamp nutrition education and promotion is an allowable expenditure.

The following is guidance on what constitutes allowable food stamp nutrition education costs in support of the physical activity DGA. Essentially, such allowable costs are limited to activities that educate about and promote physical activity, such as providing Food Stamp Program participants with information and encouragement to exercise, brief exercise demonstration, and referral to local resources.

It is recommended that State agencies balance program goals for promoting and supporting physical activity with other competing priorities, cost

accountability issues, and liability concerns. The latter is crucial because of the risks associated with engaging in physical activity, which must be seriously considered.

The following form the basic principles of FNS FSP policy on physical activity:

- Educational and program materials developed to promote and reinforce physical activity for all target audiences should include messages that link nutrition and physical activity, such as Eat Smart. Play Hard™.
- All programming such as workshops, conferences, and trainings that encourage physical activity should include a nutrition education component.
- FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity materials that are reasonable and necessary.
- Existing materials, such as Team Nutrition, Loving Support, Eat Smart. Play Hard™, etc., must be used and/or adapted whenever possible rather than developing new materials. Purchase and use of existing successful model interventions developed by others would be preferable to developing new materials. If new materials are developed, documentation of why existing materials are inadequate is required.
- FNS program cooperators are encouraged to coordinate with community, faith-based and youth organizations, and others that can make regular opportunities for physical activity accessible to children, youth and adult target populations.

Examples of Unallowable Physical Activity Education and Promotion Costs

Costs incurred for health club or gym memberships, dues, equipment, (such as bicycles, treadmills, stair steps, weights, and the like); facilities (rental or modifications); ongoing classes, exercise leaders for ongoing exercise classes. Note that the educational reinforcement items meeting the definition in A.11. above are permitted when they are of nominal value (\$3 or less per item).

Examples of Allowable Physical Activity Education and Promotion Costs

Food Stamp Program State agencies may make physical activity education and promotion coupled with nutrition education available to Food Stamp Program participants in a variety of economical ways.

The development of educational materials to teach physical activity concepts and to reinforce the health benefit of physical activity are allowable costs when these activities also promote nutrition education.

As customary, before developing new materials, look to resources available through FNS and other Federal and State sources, including other credible sources. If new materials are needed, justify their development. Also, when developing materials, we recommend the utmost care be taken in the assessment of the target audience and its needs in the accuracy of physical activity statements and advice is strongly recommended. A certified physical fitness professional should be consulted throughout the development phases of these materials. The cost of such consultation is allowable if it meets a reasonable and necessary test.

Purchases of educational materials promoting physical activity for program participants. Examples of educational materials include brochures, newsletters, posters, public service announcements, and audiotapes, videotapes, and DVDs. These materials may be purchased or obtained free from reliable sources such as government organizations, physical activity associations, or other authorities on the subject.

Physical activity education and promotion as part of nutrition education sessions in the Food Stamp Program may include provision of advice, demonstrations (instructional in nature, and not for ongoing classes), and community resource information, (such as a free local fitness event) in order to encourage program participants to engage in regular physical activities.

Consistent with A.11 above, program reinforcement items that are reasonable and necessary to reinforce increased physical activity, and that cost \$3 or less are allowable.

Additional examples of acceptable physical activity promotion may include:

- Information on local sites where Food Stamp Program participants can access a diverse range of low or no-cost activities appropriate for different ages and physical abilities.
- Physical activity bulletin boards or displays around the food stamp offices, clinics or community.
- Referral to library or web site resources.
- Development and provision of information and resource lists to Food Stamp Program recipients on how to promote safe and enjoyable physical activities. This information may also be available from:
 - Affiliates of voluntary health organizations (e.g., the American Heart Association).
 - State and local health departments.
 - Governor's Councils on Physical Fitness and Sports.
 - National Fitness Coalition
 - Coalition for Promotion of Physical Activity
 - State associations for health, physical education, recreation, and dance.
 - National Centers for Chronic Disease Prevention and Health Promotion.
 - Materials can be ordered in bulk from:

The President's Council On Physical Fitness and Sports
200 Independence Avenue SW
Room 738-H
Washington, D. C. 20201-0004
www.fitness.gov

The American Dietetic Association
National Center for Nutrition and Dietetics
216 West Jackson Boulevard
Chicago, Illinois 60606-6995
www.eatright.org

- Another source of information is:
National Recreation and Park Association
22377 Belmont Ridge Road
Ashburn, Virginia 20148-4501
info@nrpa.org<<mailto:info@nrpa.org>>

A.13 Medical Nutrition Therapy

This is not an allowable cost. Medical nutrition therapy is not within the scope of the Food Stamp Program. . Since this activity is an unallowable cost for the Federal share of costs, it is also not allowable for use in meeting the State match. If a food stamp educator becomes aware of an individual's need for a therapeutic diet, a local referral may be made

Allowable food stamp nutrition education are those health promotion activities and interventions aimed at primary prevention of disease. Activities to help people establish an active lifestyle and healthy eating habits early in life and maintain these behaviors throughout their lives would be health promotion. Activities to help people who have "risk factors" for chronic disease prevent or to postpone the onset of disease by establishing more active lifestyles and healthier eating habits would be primary prevention interventions.

Secondary prevention interventions and medical nutrition therapy are not allowable food stamp nutrition education expenditures. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability.

(See Definitions in Appendix D for a fuller discussion of medical nutrition therapy and secondary prevention interventions.)

B. Sources of State Share Program Cost

B.1 Private, Third-Party, In-kind Donations

The Food Stamp Nutrition Education State plan is approved for a specified level of funding. The federal government reimburses the State for 50 percent of allowable costs incurred by the State. The federal government is authorized to reimburse a State agency only for actual expenditures incurred. Because the value of private, third party, in-kind donations, including volunteer services, do not represent any State expenditure or outlay, they are not considered as a cost to the program, and thus are not reimbursable.

As specified under 7 CFR 277.4(e), the value of services rendered or the value of goods (i.e., in-kind) donated by private, third parties, including volunteer services, are not allowable for reimbursement purposes under the Food Stamp Program. However, State agencies are not prohibited from accepting private, third party in-kind donations.

B.2 Private, Third-Party, Cash Donations

Private, third-party cash donations are not generally allowable for reimbursement purposes. However, the State agency may request a waiver. (See A.3 for Waivers)

B.3 Other Federal Funds

The State agency's share of program costs may not include funds paid by the federal government under another assistance agreement unless authorized under that agreement and its laws or any non-Federal funds contributed for another federally-assisted program unless authorized by Federal legislation. Consequently, federal funds provided by USDA's Cooperative State Research Education and Extension Service (CSREES) to the 1862 and 1890 Land Grant Universities or to the State's Cooperative Extension Service (and any State or non-federal match for those Federal funds) may not be used as part of the State agency's share of Food Stamp Program costs. However, certain federal legislation supporting funding to Indian Tribal Organizations (ITO) contains "other Federal laws notwithstanding" language which allows tribal governing bodies to use Federal funds as matching to receive other federal funds. An ITO that chooses to submit a nutrition education plan for inclusion in the State plan can use federal funds as a local source of matching to request reimbursement for food stamp administrative funds.

In such circumstances, the State agency must provide assurance that the source of local matching funds is a federal grant containing the "notwithstanding" language, and must clearly specify the intention to use federal funds, the amount of the funds, the Federal agency source, and the citation that authorizes those Federal funds to be used as a match for other Federal funds. Also, a copy of the grant agreement between the ITO and the Federal agency must be available for review.

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights

The Food and Nutrition Service reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROM and related source codes, literature, or other products produced with Food Stamp Program funds for government purposes. The State and local agencies may sell videos or literature to other States for Food Stamp nutrition education purposes at the cost of reproduction, plus shipping and handling. If a State agency (or local agency) realizes a profit from the sale of nutrition education materials, [videos, literature, etc. paid with federal dollars], it must report the amount to FNS as program income on the SF-269 form.

C.2 Disclosure and Sharing of Case File Information

Under the provisions of both the Food Stamp Act of 1977, as amended, (the Act) and Food Stamp regulations, case file information on Food Stamp Program recipients is considered confidential and may not be released unless certain conditions are met. Section 11(e)(8) of the Act provides a limited exception to the confidentiality provision. Disclosure of information obtained from applicant households may be made only to persons directly connected with the administration of Food Stamp Program.

Previous guidance noted that the Expanded Food and Nutrition Education Program, administered by the USDA Cooperative Extension Service, met the exception provision of the Act and could therefore request certain recipient information from the State agency. This was not intended to limit the exemption provision to this Program or agency. Any organization that has a legal agreement with the State agency, may, upon request to the State Food Stamp Program agency, be permitted access to recipient information. Since the type of information requested may require State designed ad hoc reports, it is best to not request local offices to provide information.

Request examples may include non-financial information such as name of head of households with children, address, telephone numbers, or address labels for all elderly by zip codes. The information may be released solely for administration of the FSP. In this case, this means for assistance in targeting and delivering nutrition education to food stamp applicants and participating households. The receiving organization must assure that the information is shared only with relevant persons for the purpose of the targeting and delivering nutrition education, and must protect it from disclosure to other parties. Each State agency will determine the scope and type of information, based on its judgment, that may be released for purposes of providing nutrition education to applicable households.

C.3 Scholarships and Tuition

OMB Circular A-21 makes a distinction between scholarships, fellowships, and other similar financial transactions, and tuition remission and similar work/study payments. For scholarships, costs may only be charged if (1) the purpose of the scholarship is for training of selected students, and (2) approval is granted by the grantor agency. There would need to be a necessary and reasonable judgment for approval of any scholarship payment shown as a cost to food stamp nutrition education. In general, this is not a cost that would be necessary and reasonable for the purposes of this grant. In the event the scholarship is based on research activity, FNS would normally not accept the cost as being necessary and reasonable. The primary function of food stamp nutrition education is teaching nutrition education to food stamp recipients. While basic research may be a commendable activity for developing new methods or data, it is beyond the basic purpose of this grant.

Tuition remission on the other hand may be allowable in whole or in part, depending on the situation. The criteria for approval is:

1. There is a bona fide employer-employee relationship between the student and the institution for the work performed.
2. The tuition or other payments are reasonable compensation for work performed and are conditioned explicitly upon the performance of necessary work. Again any research activity should be carefully reviewed and in most cases not approved due to the fundamental differences in our grants and other grants provided for nutrition education.
3. It is the institution's practice to similarly compensate students in non-federally funded activities as well as federally funded grants.

Students who are working on food stamp nutrition education under a tuition remission situation must account for their time, as would any full time or part time staff. The financial review of this charge must take into account both the type of work performed and the number of hours worked. Again, a necessary and reasonable judgment must be made as to purpose of the work and its impact on food stamp nutrition education program.

C.4 Examples of Allowable and Unallowable Costs

The following table provides some examples of allowable and unallowable costs

EXAMPLES OF ALLOWABLE COSTS

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
Literature/Materials/Audiovisuals	
<ul style="list-style-type: none"> • Fact sheets, brochures, newsletters, etc., that are produced for distribution to food stamp recipients and applicants about nutrition education related topics such as food choices, food budgeting and food preparation. Costs for nutrition education material are encouraged to be shared between programs. The State agency must describe the method used for allocating costs between the programs. 	<ul style="list-style-type: none"> • Any nutrition education literature paid for by another federal or private program or source. • Any material that endorses or promotes brand name products or retail stores. • Manufacturer's or store (cents off) coupons. • Influencing a store's pricing policy. • Any activity or material to lobby or influence Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum, or initiative. • Negative written, visual, or written expressions about specific foods, beverages, or commodities. • Distribution of nutrition education reinforcement items over \$3.
Media Campaigns	
<ul style="list-style-type: none"> • Local radio and television announcements of nutrition education events for food stamp applicants and participants. Media announcements promoting nutrition messages to food stamp households within the community. With an approved project waiver, the target audience may be expanded to other low-income people. 	<ul style="list-style-type: none"> • Media campaigns to promote or present nutrition messages, which are not explicitly targeted to low-income or to the food stamp eligible population within the community. Nutrition education messages which convey negative messages about a disparage specific foods, beverages or commodity, or which are consisted with the Dietary Guidelines for Americans.
Equipment	
<ul style="list-style-type: none"> • Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. (This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment.) • Equipment shared with non-FSP users that is cost-shared with those users. • Kitchen appliances only with justification of reasonable and necessary need. 	<ul style="list-style-type: none"> • Electronic equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from FNS. • Medical Equipment.
Food Demonstration	
<ul style="list-style-type: none"> • Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation and display of food prepared for demonstration purposes. • Food samples associated with a nutrition education lesson. 	<ul style="list-style-type: none"> • Ongoing snack or food service • Meal size portions or complete meal service.

ALLOWABLE	UNALLOWABLE
Nutrition Education	
<ul style="list-style-type: none"> • Classroom setting (salaries, space, equipment, materials) for food stamp recipients on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class must be to provide nutrition education. If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. • Physical activity demonstration, promotion, referral that includes a nutrition message. • The pro rata share of costs of classes that are provided in conjunction with another program (e.g., WIC), provided the State agency describes the method for allocating costs between the programs. • Breastfeeding education, promotion and support which is coordinated with WIC and which supplements and complements WIC services, rather than supplanting them. 	<ul style="list-style-type: none"> • Classes that are designed to provide case management or "life skills" training (e.g., classes on English as a second language, parenting, child development, crisis management, rental information). • Medical nutrition therapy, and secondary prevention interventions (Refer to Appendix D, Definitions) • Ongoing physical activity and exercise classes, equipment or facilities. (Refer to Appendix C Physical Activity Cost Policy Section) • Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.) • Breastfeeding education, promotion and support that duplicates or otherwise is provided for under other funding sources such as WIC, EFNEP, or Head Start.
Space Allocation	
<ul style="list-style-type: none"> • Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked. 	<ul style="list-style-type: none"> • In-kind charges for space that is donated by a private third-party or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs), or the FSP, i.e. FSP county waiting room.)
Training and Other Costs	
<ul style="list-style-type: none"> • Training for staff directly related to providing nutrition education to food stamp applicants/recipients. • General briefings to community health care providers generally serving low-income communities about food stamp program nutrition education in the community. • Reimbursement for personal costs (such as child care, meals, lodging, and transportation) for recipients of food stamp nutrition education to actively participate in focus groups, needs assessments and advisory groups to inform and improve nutrition education effectiveness. 	<ul style="list-style-type: none"> • Personal costs for recipients to attend nutrition education classes such as child care and transportation services. • Reinforcement items over \$3. (Refer to Appendix C Cost Policy Section- Program Reinforcement Items) • University courses on technical or clinical subjects that are not relevant to the practical delivery of participant nutrition education. • Lobbying • Costs associated with supporting and maintaining environmental or system changes in the community, such as staffing, infrastructure, equipment, space, land, or supplies, • Training or development costs of food service workers or others not directly associated with delivery of food stamp nutrition education.

APPENDIX D

DEFINITIONS

These definitions are for clarification of terms that may be used throughout the guidance.

Activity refers to actual work performed by program personnel to implement objectives.

Applicant refers to person/households who have actually applied for the FSP.

Behavior indicates action rather than knowledge or attitudes.

Behaviorally Focused Nutrition Messages are those that are (a) related to healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example encouraging breast feeding practices, or physical activity (c) related to the environmental impact of dietary practices, including safe food handling, promoting community walking groups (d) related to food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk, and (e) food security such as applying for nutrition assistance programs (i.e. WIC, Food Stamp Program, Child Nutrition Programs, Food Distribution Programs, etc).

Budget Projection, FNS-366A is a budget report submitted by State agencies to FNS to request the amount of annual funds needed to operate the Food Stamp Program. It is the form used to support the annual funding request. Any need for additional funds require a revised 366A.

Cognizant Federal Agency refers to the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item A.2 Indirect Cost Rate in Appendix C.

<u>Organization</u>	<u>Cognizant Federal Agency</u>
State Public Assistance Agencies	Dept. of Health and Human Services (DHHS)
All Other State agencies	Federal agency identified by OMB
Educational Institution	Department of Education, Department of Defense-Naval Research or DHHS, depending on which provided more Federal funds over the last 3 years
Nonprofit Organization	Normally the Federal agency with the largest dollar value of award with the organization

Direct Contact is a face-to-face contact with a person or a household to deliver nutrition education, an educational class, workshop, group discussion, one-on-one intervention, etc.

Effectiveness is the extent to which pre-established objectives are attained as a result of program activity, as indicated by performance measures.

Fiscal Year is the Federal Fiscal year that runs from October 1st of one year through September 30th of the following year.

Grantee means the agency of the State responsible for administering the Food Stamp Program. Federal funds are paid to this agency for all food costs, and for 50 percent of all non-food expenditures, including program administration and nutrition education. The grantee in turn takes agreements with local agencies (subgrantees) to conduct nutrition education activities. Federal funds are made available to pay for half of all allowable nutrition education costs on a reimbursement basis.

Indirect Contact is the delivery of nutrition education to a household or a person through an indirect and generalized strategy, such as public service announcements, billboards, newsletters, and social marketing.

Lobbying is any activity or material to influence Federal, State, or local officials to pass, or sign legislation or to influence the outcomes of an election, referendum, or initiative.

Low Income Persons are people participating in or applying for the Food Stamp Program, as well as people with low financial resources defined as gross household incomes at or below 185 percent of poverty. National School Lunch Program data

on number of children eligible for free and reduced price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where low income persons reside, are available data sources that can be used to identify low income populations. Participation in WIC may also be used as a proxy for low income since WIC participants have gross family incomes below 185 percent of poverty.

Marketing Orders generally refer to USDA or State programs that support prices and consumption of various fruits, vegetables, milk, eggs and meat programs. Funds are collected from the producers and used to publicize the item in question. Limits to production are also enforced. (For example both Florida and California have orange marketing order boards). With some constraints, money and services provided by marketing boards can compromise an allowable component of a State Plan. However, the promotion of a specific item (for example, only oranges) is not an allowable expense.

Medical Nutrition Therapy Services means the assessment of the nutritional status of patients with a condition, illness, or injury (such as diabetes, hypertension, gout, etc.) that puts them at risk. This includes review and analysis of medical and diet history, laboratory values, and anthropometric measurements. Based on the assessment, nutrition modalities most appropriate to manage the condition or treat the illness or injury are chosen and include the following:

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.
- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; parenteral nutrition delivered via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients.

Medical Nutrition Therapy Services are not allowable food stamp nutrition education costs.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs of individuals and/or target populations in the community.

Non-Federal Public Agency is a State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such

as organizations that are chartered by State or local governments for public purpose.

Nutrition Education Plan is an official written document which describes food stamp nutrition education services to be provided. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

Plan Confirmation means a time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of Plan Confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of Plan Confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS (Normally this will not be an issue since audits normally occur at least every two years). For further information refer to OMB Circular A-21. If approval through the audit process has not occurred, the Division of Cost Allocation, DHHS, should be contacted as follows:

The U.S. Department of Health and Human Services
Office of the Secretary
Division of Cost Allocation
200 Independence Ave, S.W.
Washington, D.C. 20201
Telephone: 202-401-2808
Toll Free: 1-877-696-6775

Project means a discrete unit of nutrition education intervention at the local level which is distinguished by a specifically identified low income target population. The term "Project" is intended to apply to a geographic area for the sole purpose of developing and supporting a request for a waiver to serve a target population that is low income, but not necessarily participating in or applying for the Food Stamp Program. Census data by zip code or census tract are sources of documentation.

Public Education Outreach Message is a brief message providing information on the availability, benefits, and application procedures for the Food Stamp Program, preferably with information on local application sites, (or a toll-free number, or other useful information on how to find services). When food stamp nutrition education is provided to low income persons not participating in the Food Stamp Program, by virtue of approved waivers, a critical component of the nutrition

message must be to provide an educational message about the availability and benefits of the program and how to apply. This should be done "in the context" of nutrition education, meaning the Food Stamp Program should routinely be referenced in nutrition education sessions and on materials as an important source of nutrition assistance to help low income persons achieve a better diet.

Random Moment Time Studies are time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities and funding sources.

Secondary Prevention Interventions mean activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. Secondary prevention interventions are not allowable costs in the Food Stamp Program.

Social Marketing is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of multiple tactics to reach a target audience.

State Agency means the agency of State government, including the local offices thereof, which is responsible for the administration of the federally aided public assistance programs within the State, and in those States where such assistance programs are operated on a decentralized basis, it includes the counterpart local agencies which administer such assistance programs for the State agency.

Subgrantee means the organization or person to which a State agency, as grantee, takes an agreement to conduct nutrition education activities. Federal funds reimburse the grantee for half of its allowable administrative costs, including nutrition education. The grantee in turn generally will reimburse subgrantees for half of their allowable costs. The subgrantee is accountable to the grantee for the use of funds provided, and the grantee is accountable to The Food and Nutrition Service for the use of all Federal funds provided.

APPENDIX E

FOOD STAMP NUTRITION CONNECTION WEB SITE

The Food and Nutrition Service (FNS) and the National Agriculture Library's Food and Nutrition Information Center (FNIC) sponsor an online resource, called the **Food Stamp Nutrition Connection**. This web site is designed to improve access to Food Stamp Program nutrition resources. Educators nationwide can use this site to identify curricula, lesson plans, research, training, tools and participant materials. The Food Stamp Nutrition Connection is available at www.nal.usda.gov/foodstamp

At the web site, you will find nutrition tools and information specifically addressing the needs of the low-income audiences. This resource is not restricted to materials developed with funding from the Food Stamp Program. Further, material on the site are reviewed for basic quality, but their inclusion on the site does not constitute endorsement by USDA. Major sections of the site include a Training Center, Resource Library, Hot Topics A-Z and Program facts.

We encourage you to subscribe to FSNC-Talk, an electronic mailing list for national, regional and state Food Stamp Program nutrition education contacts. Information about how to join the list is available on the Food Stamp Nutrition Connection web site.

Also, you're invited to share your materials with FNIC so that others may benefit from your experience and expertise. A hard copy and an electronic copy of each document is preferred. Please submit nutrition education or training materials such as videos, curricula, games, handouts, booklets, displays, web-based modules, and lesson plans to the Food Stamp Nutrition Connection Resource System for use on the Web site or in the database. For details on how to submit materials, visit the Sharing Center on the Food Stamp Nutrition Connection Web site at this address: http://www.nal.usda.gov/foodstamp/Library/sharing_part1-2.html. You may also send an email to: FSNC@nal.usda.gov or call (301) 504-5414. If you would like to donate a copy of a new resource for review, please address it to:

Food Stamp Nutrition Connection
Food and Nutrition Information Center
USDA/ARS National Agricultural Library
10301 Baltimore Avenue, Suite 105
Beltsville, MD 20705-2351

Or you may use the following form as a handy way to submit items.

Continuing updates and new developments are planned for the Food Stamp

Nutrition Connection website in the upcoming year-- so check back often for new additions. If you have any questions about the resource system or information provided, contact staff by telephone at (301) 504-5719, by fax at (301) 504-6409, or by e-mail at FSNC@nal.usda.gov

For your convenience, you may find this format useful in submitting materials to the Food Stamp Nutrition Connection website.

Resource Sharing

Please take a few minutes to share information about your nutrition education and training resources.

Part 1. About You

Please provide your contact information in case we have questions about this resource. View our [Privacy Policy](#).

1. Your name:
2. Your e-mail address:
3. Which best describes your relationship to the resource you are submitting?
 - ☐ I developed this material (complete sections I-III)
 - ☐ I distribute or handle ordering for this material (complete sections I, II and IV)
 - ☐ I use this resource but I am not the developer or distributor of this material (complete sections I and II)

Part II. Resource Information

Please tell us about the material you are submitting.

1. Resource Title: _____
2. Developer/ Author(s): _____
3. Primary Author's Affiliation: _____
4. Publication/Revision Date: _____ Edition: _____
5. How is this material used?
 - ☐ Consumer Education
 - ☐ Staff Training
 - ☐ Background Information/Research
6. What languages are available?
7. If this resource is available online, please provide the web site address (URL).

8. Briefly, describe your resource.

9. How do we contact the publisher/distributor?

Publisher Name _____

Street Address _____

City _____ State _____ Zip Code _____

Telephone _____ E-mail _____

Part III. Author/ Developer Information

Please share information about how this material was developed.

1. Please describe the target audience.

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